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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO WESTERN DIVISION

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)	MDL Docket No. 1:10-md-2197-DAK
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)	HONORABLE DAVID A. KATZ
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NOTICE OF ORAL AND VIDEO DEPOSITION OF DEPUY ORTHOPAEDICS, INC., PURSUANT TO F.R. CIV. P. RULE 30(b)(6) (Retention)

TO: Robert C. Tucker, Esq.
TUCKER ELLIS & WEST LLP
1150 Huntington Building
925 Euclid Avenue
Cleveland, OH 44115

Susan M. Sharko, Esq. DRINKER BIDDLE & REATH LLP 500 Campus Drive Florham Park, NJ 07932-1047

Attorneys for Defendant DePuy Orthopaedics, Inc.

PLEASE TAKE NOTICE that pursuant to Rule 26 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs, by and through their undersigned attorneys, the Plaintiffs Steering Committee in the above-captioned Multidistrict Litigation, will take the deposition of DePuy Orthopaedics, Inc. on Wednesday, April 28, 2011, at 9:00 a.m., or such other time as is agreed upon by the parties, at the offices of the Hyatt Place Indianapolis Airport, 5500 W. Bradbury Avenue, Indianapolis, Indiana 46241, or at another location mutually agreed upon by

the parties. Pursuant to Fed. R. Civ. P. 30(b)(6), DePuy Orthopaedics, Inc. shall designate and produce a representative or representatives, as may be required, to testify on behalf of DePuy Orthopaedics, Inc. concerning the topics identified in Exhibit A attached hereto.

The deposition shall be recorded by stenographic and audiovisual means and taken before a person authorized by law to administer oaths, pursuant to Fed. R. Civ. P. 28, and will continue from day-to-day, excluding Sundays and court-recognized holidays, until the examination is completed.

Dated: March 25, 2011 Respectfully submitted,

ZOLL, KRANZ & BORGESS, LLC,

By: /s/ Michelle L. Kranz

Michelle L. Kranz (0062479) ZOLL, KRANZ & BORGESS, LLC 6620 W. Central Ave., Ste. 100

Toledo, OH 43617 Tel: (419) 841-9623

Email: michelle@toledolaw.com

Plaintiffs' Liaison Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2011, a copy of the above and foregoing NOTICE OF ORAL AND VIDEO DEPOSITION OF DEPUY ORTHOPAEDICS, INC., PURSUANT TO FED. R. CIV. P. 30(b)(6), and the Exhibit A hereto, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system. It has also been served by U.S. Mail and e-mail on the counsel listed below:

Robert C. Tucker, Esq. TUCKER ELLIS & WEST LLP 1150 Huntington Building 925 Euclid Avenue Cleveland, OH 44115

Susan M. Sharko, Esq. DRINKER BIDDLE & REATH LLP 500 Campus Drive Florham Park, NJ 07932-1047

Dated: March 25, 2011

_/s/ Michelle L. Kranz _____

Plaintiffs' Liaison Counsel